



into these proceedings is pending, essentially making the Objection akin to a counterclaim. Plaintiff/Claimant is therefore filing this Response in the Adversary as well as the main case and referencing each numbered section of the Objection herein.

1. Plaintiffs/Claimants admit that a portion of the basis for their claim was quoted in paragraph 1 of the Objection.

2. Plaintiffs/Claimants acknowledge that paragraphs 3 and 4 state basic propositions of law.

3. Plaintiffs/Claimants admit the allegations of paragraphs 6, 10 and the case number and date of suit referenced in paragraph 11.

4. Plaintiffs/Claimants deny the allegations in paragraph 2 and 5.

5. Paragraphs 12 and 13 seek judicial notice of various Texas Statutes which does not require a response. Such a request should be brought separately from the Objection.

6. Paragraphs 14 through 34 are legal argument and opinion statements, not requiring a response; however, to the extent that a response is required, Plaintiffs/Claimants specifically deny the allegations in paragraphs 19 through 26, 28 through 29, and 32 through 34.

WHEREFORE, B Frazier Asset Management and Brian Frazier request that this Court Award them their portion of the partnership assets of The Alvord 287 Joint Venture and liquidate the remaining direct claims against the Debtor arising from Debtor's breach of the Joint Venture Agreement, breaches of fiduciary duties, defalcation and conversion to Plaintiff/Claimants.  
Executed: March 7, 2022

Respectfully submitted,

/s/ Lyndel Anne Vargas  
Lyndel Anne Vargas

State Bar No. 24058913  
CAVAZOS HENDRICKS POIROT, P.C.  
Suite 570, Founders Square  
900 Jackson Street  
Dallas, TX 75202  
Phone: (214) 573-7344  
Fax: (214) 573-7399  
Email: LVargas@chfirm.com

Attorneys for Plaintiffs/Claimants- B. Frazier  
Management, Inc. and Brian Frazier

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the forgoing document was served on March 7, 2022 by electronic transmission through the Court's automated Case Management and Electronic Docketing System for the U. S. Bankruptcy Court for the Northern District of Texas, Fort Worth Division, on all parties-in-interest submitting to service of papers in this case by said means.

/s/ Lyndel Anne Vargas  
Lyndel Anne Vargas